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UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

In re:
NEW JERSEY MOTORSPORTS PARK, LLC, <i>et al.</i> ,
Debtors

Chapter 11  
Case No. 11-16752 JHW  
Jointly Administered

**STATEMENT MADE IN ACCORDANCE WITH FEDERAL RULE OF BANKRUPTCY  
PROCEDURE 2016 FOR NEW JERSEY MOTORSPORTS PARK, LLC**

I, Nella M. Bloom, Esquire, of full age, hereby certify as follows:

1. I am an associate attorney in the law firm of Cohen, Seglias, Pallas, Greenhall & Furman, P.C., proposed counsel for the Debtor, New Jersey Motorsports Park, LLC (“NJMP”), New Jersey Motorsports Park Operating Company, LLC (“Operating”), New Jersey Motorsports Park Urban Renewal, LLC (“Urban Renewal”), and New Jersey Motorsports Park Development Associates, LLC (“Development”) (collectively the “Debtors”), and as such I am entrusted with the conduct and management of these proceedings on behalf of the Debtors.
2. I am the proposed attorney for NJMP in the above-referenced case pursuant to an Application filed and pending before this Court.
3. NJMP has agreed to pay compensation to the undersigned, including an advance payment on account of legal services rendered and to be rendered in connection with this Chapter 11 bankruptcy proceeding. Operating, on behalf of all the Debtors, made an advance

payment retainer of fifty-five thousand dollars (\$55,000.00) for services related to the bankruptcy proceeding. In addition, the Debtors agreed that if counsel exhausted the advance payment retainer, counsel could apply to the Court for additional compensation.

4. The services rendered or to be rendered include the following:

- (a) rendering assistance to the Debtors with respect to planning prior to filing of the Chapter 11 Petition;
- (b) preparation and filing of the Chapter 11 Petition initiating this proceeding as well as preparation and filing of Schedules, Statement of Financial Affairs, and other documents required by the Court;
- (c) participating, along with the Debtors, in the formulation of a plan or plans;
- (d) representation of the Debtors at the meeting of creditors as well as at various hearings; and
- (e) general retainer to represent the Debtors in this proceeding and to render all necessary legal services, excepting services requiring specialized non-bankruptcy expertise, for which services it is contemplated special counsel will be retained, if necessary.

5. As of the close of business on March 6, 2011, the date prior to the filing of the Petition herein, the Debtors had thirty-six thousand, one hundred fifty-nine dollars and no cents (\$36,159.00) in funds available as a credit against future legal services and costs.

6. The source of any further payments to counsel will be from assets of the Debtors' estate or the Debtors, upon application to, and approval by, the Bankruptcy Court.

7. The undersigned has received no transfer, assignment or pledge of property in connection with these proceedings, except as set forth above.

8. The undersigned has not shared nor agreed to share with any person, other than with members of the undersigned's law firm, any compensation paid or to be paid.

**COHEN, SEGLIAS, PALLAS,  
GREENHALL & FURMAN, P.C.**

/s/ Nella M. Bloom

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**Nella M. Bloom, Esquire**  
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*Attorney for the Debtors*

DATED: March 18, 2011